

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Federal-State Joint Board)	CC Docket No. 96-45
on Universal Service)	(FCC 05J-1)

To: The Federal-State Joint Board

**REPLY COMMENTS OF
PUBLIC UTILITY COMMISSION OF OREGON**

These reply comments are submitted by the Public Utility Commission of Oregon ("Oregon Commission") in response to the Public Notice released August 17, 2005 on behalf of the Federal-State Joint Board on Universal Service. The Public Notice seeks comments and reply comments on proposals to modify the Commission's rules relating to high cost universal service support.¹

Summary

- Section 254 requires that universal service support must be "specific, predictable and sufficient" for "low-income consumers and those in rural, insular, and high cost areas" not for particular companies serving those consumers.
- The U.S. Census Bureau appropriately defines "rural" and this definition should be used to determine eligibility for high cost funding.
- The Oregon Commission has never approved the investments of rural telephone cooperatives and has not approved the investments of any rural telephone company for two decades. Rural telephone companies are largely free from economic regulation in Oregon. For purposes of this proceeding, they are best thought of as unregulated companies.
- Universal service funds should not be given to largely unregulated companies without accountability. Specific "contracts" that reflect the unique characteristics of each rural area are the best way to accomplish this.
- Federal and State commissions have a very important duty to ensure that universal service funds derived from a tax on consumers are spent wisely. This responsibility should not be delegated to unregulated companies.

¹ *Federal-State Joint Board on Universal Service Seeks Comment on Proposals to Modify the Commission's Rules Relating to High-Cost Universal Service Support*, Public Notice, CC Docket No. 96-45, FCC 05J-1 (rel. Aug. 17, 2005) ("Public Notice"). On September 13, 2005, the Commission extended the comment deadline. *Federal-State Joint Board On Universal Service Extends Deadlines For Filing Comments And Reply Comments*, Public Notice, 05J-2, CC Docket No. 96-45, (rel. Sep. 13, 2005).

- The SAM does not violate the Communications Act or the 10th Amendment.
- State distributions of universal service funds must be subject to clear, specific Federal guidelines and review standards.

Section 254 requires that universal service support must be “specific, predictable and sufficient” for “low-income consumers and those in rural, insular, and high cost areas” not for particular companies serving those consumers.

A number of commenters suggest or imply that universal service funding must be specific, predictable, and sufficient for each incumbent rural local exchange carrier in order to comply with §254 of the Communications Act of 1934, as amended. §254 is addressed to providing support for consumers, not companies. Congress defined “rural telephone company” in §3(37) of the Act and employed the term where it thought appropriate. §254 is not one of those places. Instead, universal service funds are distributed to eligible telecommunications carriers (“ETCs”) designated by State commissions pursuant to §214(e) (2). Once designated, all ETCs have the same status under the Act; there is no distinction among rural incumbent ETCs serving rural areas, non-rural incumbent ETCs serving rural areas and competitive ETCs serving rural areas. There is no reference to non-rural companies internally cross-subsidizing their rural customers.

ETCs cannot serve rural consumers without some degree of specificity, predictability and sufficiency of universal service funding. The investments they are required to make are not justified in the absence of universal service funding or the funding would not be appropriate in the first place. If an ETC is certain of its funding in perpetuity, particularly via a cost-plus mechanism, it has a reduced incentive to meet universal service requirements in an efficient manner. An appropriate balance must be struck between certainty for ETCs and accountability to consumers. ETCs must be aware that if they don’t provide universal service in an efficient and effective manner, their funding will be reduced or eliminated. They should be accountable not only to their own customers, but to the consumers elsewhere who are providing the support.

Most ETCs must currently be recertified annually by the State commission, or the FCC acting in the place of the State commission, so there is at least the theoretical possibility that an ETC could be decertified if it is not meeting its universal service obligations. As a practical matter, decertification is too draconian to be a viable tool for maintaining accountability. All or nothing annual recertification is of almost no practical value.

The SAM proposal advanced by Commissioner Baum offers a more practical approach to accountability. State commissions would make distributions of universal service funds to ETCs for a multi-year period based on specific representations by the ETC as to the investments it will make and the services it will offer over that period. Five years is the suggestion made in the proposal. During that time, funding would not be withdrawn or reduced unless the ETC failed to meet its commitments. If commitments are not met, funding could be reduced until performance improves without cutting it off altogether. The annual recertification would be dropped in favor of periodic performance reviews. This approach would actually increase the specificity, predictability, and sufficiency of universal service support to individual ETCs while maintaining accountability. In effect, universal service funding would be provided pursuant to a contract between the ETC and the representative of the consumers it is designed to serve.

The U.S. Census Bureau appropriately defines “rural” and this definition should be used to determine eligibility for high cost funding.

Attachment I describes the definition of rural areas in the U.S. Census and provides an empirical example. According to the Census Bureau:²

URBAN AND RURAL

The U.S. Census Bureau classifies as urban all territory, population, and housing units located within urbanized areas (UAs) and urban clusters (UCs). It delineates UA and UC boundaries to encompass densely settled territory, which generally consists of:

- A cluster of one or more block groups or census blocks each of which has a population density of at least 1,000 people per square mile at the time, and*
- Surrounding block groups and census blocks each of which has a population density of at least 500 people per square mile at the time, and*
- Less densely settled blocks that form enclaves or indentations, or are used to connect discontinuous areas with qualifying densities.*

Rural consists of all territory, population, and housing units located outside of UAs and UCs. Geographic entities, such as metropolitan areas, counties, minor civil divisions (MCDs), and places, often contain both urban and rural territory, population, and housing units.

Urban Cluster (UC)

An urban cluster (UC) consists of densely settled territory that has at least 2,500 people but fewer than 50,000 people. . . .

Urbanized Area (UA)

An urbanized area (UA) consists of densely settled territory that contains 50,000 or more people. The U.S. Census Bureau delineates UAs to provide a better separation of urban and rural territory, population, and housing in the vicinity of large places.

For telecommunications purposes, this constitutes a generous definition of rural. Although exceptions could be granted based on a specific showing that an area

² <http://www.census.gov/geo/www/tiger/glossry2.pdf>

designated by the U.S. Census as urban is in fact high cost, this definition should be used as a preliminary screen to determine eligibility for high cost support.

One of many advantages of using the U.S. Census definitions is that it allows the use of all of the other Census information in establishing affordability and reasonable comparability.

Census geography is used in other areas of the FCC's universal service program. Specifically, the rural health care program uses census designations to determine the eligibility of health care providers for universal service support.

The Oregon Commission has never approved the investments of rural telephone cooperatives and has not approved the investments of any rural telephone company for two decades. Rural telephone companies are largely free from economic regulation in Oregon. For purposes of this proceeding, they are best thought of as unregulated companies.

In its comments, the National Telecommunications Cooperative Association ("NTCA") makes the following assertion:³

Limiting support to anything less than the total cost of network facilities will halt future investment to modernize the telecommunications infrastructure in rural America and jeopardize the ability of rural carriers to service debt for plant facilities already constructed and lawfully approved by regulators.

The Oregon Commission does not regulate the rates, terms, and conditions of retail telecommunications services provided by cooperatives nor does it approve their investments. (ORS 759.225) Moreover, all unaffiliated utilities with fewer than 50,000 access lines are largely free from economic regulation.⁴ (ORS 759.040) This has been true for decades.

Were this only true in Oregon, it might be ignored for purposes of establishing Federal policy. However, deregulatory legislation is being enacted in many States, so that Oregon's regulatory environment is increasingly common. The assumption that rural telephone companies' investments have been approved by State commissions is simply not justified. This is true of both cooperatives and investor-owned rural companies.

Similarly, we are not aware of any Federal approval process for investments made by rural telephone companies. The Federal Communications Commission ("FCC") does not approve the operating expenses of rural telephone companies

³ National Telecommunications Cooperative Association, Initial Comments in CC Docket No. 96-45, September 30, 2005, p. 7.

⁴ The Oregon Commission does retain authority over all companies' intrastate access charges, however.

and they are able to use an authorized rate of return that is not based on their capital structure.

What is the significance of this? If a rural telephone company is subject to pervasive economic regulation, there is arguably no necessity for separate accountability provisions in the Federal universal service program. A case can be made for distributing universal service funds with an accounting mechanism loosely based on embedded costs. If, however, rural telephone companies are not subject to economic regulation, then there is no basis for an automatic assumption that the investments and expenses are appropriate. A mechanism for accountability must be established.

Of course, exactly the same thing is true for non-incumbent ETCs. Neither the Oregon Commission nor the FCC applies any economic regulation to competitive wireless or wireline ETCs. These are private businesses that properly seek to maximize their profitability. In the absence of an accountability mechanism, their incentive is to drop any universal service funds to their bottom lines.

Universal service funds should not be given to largely unregulated companies without accountability. Specific “contracts” that reflect the unique characteristics of each rural area are the best way to accomplish this.

There is absolutely nothing wrong with private businesses and cooperatives serving the interest of their owners. The interaction of businesses and consumers in private markets has proven to be the best way to organize an economy. In the case of government funding for rural infrastructure derived from a “tax” on consumers, however, the government must fill the role of buyer on behalf of supported consumers or give the money to consumers directly in the form of vouchers.

We urge the FCC to adopt the assumption in this proceeding that ETCs are unregulated private businesses and that, therefore, accountability is a key issue. Federal and State commissions must be in a position to assure consumers who pay into the universal service fund that the money is being prudently and efficiently expended.

The SAM can be thought of as akin to a contracting process. State commissions would receive an allocation of Federal universal service funds for a period of time, perhaps five years, including an annual adjustment for inflation. The State commissions would then ask ETCs to submit funding requests for the ensuing five year period detailing the services they propose to provide, the service standards they will meet, how the prices they will charge are affordable and reasonably comparable, etc. State commissions would then distribute their allocations to ETCs based on these service commitments, which would have the status of contracts. The ETC would expect to continue receiving this funding for the duration of the period so long as it met its commitments.

Federal and State commissions have a very important duty to ensure that universal service funds derived from a tax on consumers are spent wisely. This responsibility should not be delegated to unregulated companies.

The illustrative implementation of SAM just described is distinctly different from the use of an accounting methodology loosely based on embedded costs pursuant to which unregulated ETCs automatically receive funding based on what they spend. The Oregon Department of Transportation does not say to a designated bridge contractor: “The service we want is the construction of a bridge across the Rogue River in Grants Pass. Build the bridge and send us a bill detailing the costs of constructing it, including a profit margin we have prescribed for the industry.” Would the public be satisfied that appropriate oversight was being exercised if Oregon confined itself to an accounting audit of the bill?

Government’s responsibility is clear. It must establish a mechanism for accountability. This responsibility cannot be delegated to unregulated companies, who are by law charged with serving the interests of their owners. This responsibility cannot be fulfilled by accounting audits alone.

The SAM is a way to ensure that funds are spent wisely. Those who oppose it must propose an alternative. The status quo is not acceptable.

The SAM does not violate the Communications Act or the 10th Amendment.

NTCA argues that the use of block grants of federal USF support to the states would violate the Act and the Tenth Amendment.⁵ NTCA first explains that, under its understanding of block grants, such as the SAM proposal, State commissions would have unbridled discretion to determine which carriers receive federal USF support and the amount of that support. With little explanation, NTCA asserts that granting the states such unfettered discretion to decide federal USF collection and distribution issues would violate the Act and the Tenth Amendment.

NTCA is incorrect in its understanding of both the SAM proposal and of the law. The SAM approach does not advocate that the states have complete discretion to collect and distribute the federal USF support to telecommunications carriers. Rather, under the SAM proposal, the FCC would establish guidelines and review State distribution decisions. Thus, there is no issue of improper delegation of authority by the FCC to the states under the Act or the Tenth Amendment under the SAM plan.

The Tenth Amendment provides in relevant part that “[t]he powers not delegated to the United States by the Constitution, nor prohibited by it to the States, are reserved to the States respectively, or to the people.” NTCA’s reliance on the

⁵ Supra, n. 3, at 8-9.

Tenth Amendment is misplaced and curious because the courts typically view it as a shield protecting the sovereignty of the states in their relationship with the federal government.⁶ For example, the Supreme Court stated that the Tenth Amendment prohibits Congress from requiring states to administer federal programs against their will.⁷ Thus, again, in the typical case a state relies upon the Tenth Amendment to say Congress has intruded on business that is left to it under the Constitution, not that the state has somehow intruded on the federal government's authority. With this understanding of the law, the Oregon Commission disagrees with NTCA's unsupported conclusion that the SAM proposal would violate the Tenth Amendment.

Finally, the Oregon Commission observes that there would in any event be no Tenth Amendment issue if the FCC voluntarily chose to grant the states authority to administer certain aspects of the federal USF program. Stated differently, there is no concern under the Tenth Amendment if the federal government consents to the states exercising certain aspects of its authority under guidelines and review the government establishes.

State distributions of universal service funds must be subject to clear, specific Federal guidelines and review standards.

As a matter of law and policy, the FCC must establish clear, specific federal guidelines and review standards implementing the SAM. The guidelines and standards must be specific enough to ensure that the FCC fulfills its responsibilities under §254 of the Communications Act but still allow the States enough flexibility to reflect local circumstances and conditions. The Oregon Commission still believes that development of the specific Federal guidelines for the SAM should be deferred to a subsequent proceeding before the Universal Service Joint Board. In view of some of the initial comments, however, it is appropriate to suggest what some of these might be. The following is to be understood as illustrative and incomplete.

- 1) State commissions must certify to the FCC that they are able to determine the distribution of Federal high cost and low income funds. If a State does not so certify, the FCC will act in its place;
- 2) Only ETCs may receive high cost funds;
- 3) One ETC in each rural area, selected by the State commission, must receive funding that is sufficient to meet statutory requirements and FCC rules implementing those requirements before funding is provided to additional ETCs;
- 4) Capability must be provided at a minimum for basic voice telephone service, as defined by the FCC. The definition will allow this service to be provided by any ETC and any technology to the maximum extent practical.

⁶ See *New York v. United States*, 505 U.S. 144 (1992).

⁷ See *Printz v. United States*, 117 S.Ct. 2365, 2383 (1997) (Court struck a section of the Brady Handgun Violence Protection Act requiring local officials to conduct background checks before allowing the purchase of handguns).

State commissions are free to set priorities for broadband and mobility service so long as the requirement that basic voice telephone service is available at affordable and reasonably comparable rates is met;

- 5) For each five year period, the States must prepare and send to the FCC for review a distribution plan for high cost and low income universal service funds that specifically describes how it complies with the statute and FCC rules implementing statutory requirements. The FCC will review the State plans for compliance with the statute and its rules after opportunity for comment. Any State plan that meets the minimum requirements of the statute and FCC rules must be approved;
- 6) If a State determines that it cannot meet the statutory requirements and FCC rules implementing them using the State allocation it has been given by the FCC, the State must either relinquish the determination of the State's distribution to ETCs or submit, within 180 days of learning its allocation, an analysis demonstrating that the allocation is insufficient. The FCC must act upon this petition within 90 days by either making an additional allocation of funds to the State which it determines is adequate to meet statutory guidelines and its rules or itself make a distribution to the ETCs in that State.



Lee Beyer
Chairman
Commissioner



John Savage
Commissioner



Ray Baum

Attachment I

The Classification of Rural Areas in the US Census

According to the Census Bureau:⁸

URBAN AND RURAL

The U.S. Census Bureau classifies as urban all territory, population, and housing units located within urbanized areas (UAs) and urban clusters (UCs). It delineates UA and UC boundaries to encompass densely settled territory, which generally consists of:

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Rural consists of all territory, population, and housing units located outside of UAs and UCs. Geographic entities, such as metropolitan areas, counties, minor civil divisions (MCDs), and places, often contain both urban and rural territory, population, and housing units.

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Urbanized Area (UA)

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Significant changes were made to the definition of urban and rural areas for the 2000 decennial census. They were not announced until 2002.

The Census Bureau's succinct description is repeated here:⁹

URBAN AND RURAL

*Q. I notice that Census 2000 provides data for **urban clusters**. What are these?*

*A. For recent censuses, the U.S. Census Bureau defined **urban** as including all population and territory in **urbanized areas**, which are densely settled areas containing at least 50,000 people, and in other places with a population of 2,500 or more (but excluding the portion of a few incorporated places that contained a significant amount of sparsely settled territory). To provide better data for the nation's urban and rural populations, the Census Bureau decided it was necessary to establish a geographic entity that better supplemented the urbanized areas. Thus, for Census 2000, it established **urban clusters**, which are densely settled areas with a population*

⁸ <http://www.census.gov/geo/www/tiger/glossry2.pdf>

⁹ <http://www.census.gov/geo/www/tiger/glossary.html#urbanandrural>

of 2,500 to 49,999.³ The Census Bureau also made some refinements to the criteria for delineating urbanized areas for Census 2000.

Note: The new definition of urban and related terminology, and the criteria for designating and delineating urban areas, were published in the Federal Register on March 15, 2002. The Federal Register Notice is accessible from the [Census Bureau's Urban and Rural Classification Web page](#).

*Q. I notice that many more **places are partly urban and partly rural**.*

*A. Delineation of urbanized areas and urban clusters is now based strictly on aggregations of block groups and census blocks, and therefore do not take into consideration the boundaries of legal and statistical entities as the urbanized areas did for the 1990 census. Census 2000 refers to places that are partly urban and partly rural as **extended places**; this replaces the previous term, **extended cities**, because a census designated place (as well as any incorporated place) can now be partly urban and partly rural.*

*Q. What is the effect of the change in the **urban definition**?*

A. Many places - both incorporated places and census designated places - will now be split between urban and rural components. The U.S. Census Bureau estimates that the changes in the criteria may classify as urban as many as an additional 3 percent of the population (about 5 million people), but 7 percent less area (about 6,600 square miles).

Source: <http://www.census.gov/geo/www/tiger/glossary.html#urbanandrural>

The key point is that urban and rural areas are now defined based on census blocks and block groups, the basic building blocks of the census, and are not based on the boundaries of legal entities such as counties. Thus, results are now much more refined and are available for areas much smaller than counties. Counties are not classified as either urban or rural.

An illustrative example may prove helpful. The Census Bureau maintains an online data extraction tool called American Factfinder, which allows for the creation of custom tables. Although this particular feature is intended for expert users, anyone with a little patience can learn to use it. It is available at: http://factfinder.census.gov/servlet/CTGeoSearchByListServlet?ds_name=DEC_2000_SF1_U&lang=en&ts=145881596796.

Using New York as an example, Table 1 displays the results by county. Note that, for each county, data are presented for urban areas in total, urbanized areas, urban clusters, and rural areas. Now selecting a particular county, Steuben for example, the results can be displayed by township, as can be seen in Table 2. Steuben is in a very rural area in the Finger Lakes region of New York State, but notice that even a small township, such as Bath, is subdivided into the population inside urban clusters and rural areas. This is because the definitions of urban and rural are applied at the census block and block group

levels, which can be mapped into Townships. For states without townships, the Census department defines equivalent county subdivisions.

Maps are available for all of these geographies, as illustrated by Map 1 below. Shape files are available for use in geographical information systems.

Data are available for housing units as well as population.

The Census data are an extremely valuable resource which the Joint Board should consider taking advantage of.

Table 1

	P002001	P002002	P002003	P002004	P002005
	Total population: Total	Total population: Urban	Total population: urbanized areas	Total population: clusters	Total population: Rural
Albany County, New York	294,565	265,913	261,145	4,768	28,652
Allegany County, New York	49,927	10,371	0	10,371	39,556
Bronx County, New York	1,332,650	1,332,650	1,332,650	0	0
Broome County, New York	200,536	147,719	147,719	0	52,817
Cattaraugus County, New York	83,955	34,920	0	34,920	49,035
Cayuga County, New York	81,963	38,927	0	38,927	43,036
Chautauqua County, New York	139,750	82,383	0	82,383	57,367
Chemung County, New York	91,070	67,159	67,159	0	23,911
Chenango County, New York	51,401	8,713	0	8,713	42,688
Clinton County, New York	79,894	31,146	0	31,146	48,748
Columbia County, New York	63,094	18,425	0	18,425	44,669
Cortland County, New York	48,599	26,820	0	26,820	21,779
Delaware County, New York	48,055	7,203	0	7,203	40,852
Dutchess County, New York	280,150	198,688	187,256	11,432	81,462
Erie County, New York	950,265	864,632	851,622	13,010	85,633
Essex County, New York	38,851	9,718	0	9,718	29,133
Franklin County, New York	51,134	20,011	0	20,011	31,123
Fulton County, New York	55,073	27,299	0	27,299	27,774
Genesee County, New York	60,370	24,318	0	24,318	36,052
Greene County, New York	48,195	14,562	0	14,562	33,633
Hamilton County, New York	5,379	0	0	0	5,379
Herkimer County, New York	64,427	31,421	1,311	30,110	33,006
Jefferson County, New York	111,738	52,897	0	52,897	58,841
Kings County, New York	2,465,326	2,465,326	2,465,326	0	0

	P002001	P002002	P002003	P002004	P002005
	Total population: Total	Total population: Urban	Total population: urbanized areas	Total population: Inside urban clusters	Total population: Rural
Lewis County, New York	26,944	3,386	0	3,386	23,558
Livingston County, New York	64,328	28,995	0	28,995	35,333
Madison County, New York	69,441	29,010	2,226	26,784	40,431
Monroe County, New York	735,343	684,966	672,866	12,100	50,377
Montgomery County, New York	49,708	29,422	0	29,422	20,286
Nassau County, New York	1,334,544	1,332,322	1,332,322	0	2,222
New York County, New York	1,537,195	1,537,195	1,537,195	0	0
Niagara County, New York	219,846	164,948	125,081	39,867	54,898
Oneida County, New York	235,469	151,858	112,098	39,760	83,611
Onondaga County, New York	458,336	397,264	393,800	3,464	61,072
Ontario County, New York	100,224	49,583	12,540	37,043	50,641
Orange County, New York	341,367	258,198	205,899	52,299	83,169
Orleans County, New York	44,171	18,925	0	18,925	25,246
Oswego County, New York	122,377	43,441	6,241	37,200	78,936
Otsego County, New York	61,676	16,182	0	16,182	45,494
Putnam County, New York	95,745	72,855	69,433	3,422	22,890
Queens County, New York	2,229,379	2,229,379	2,229,379	0	0
Rensselaer County, New York	152,538	103,338	99,345	3,993	49,200
Richmond County, New York	443,728	443,728	443,728	0	0
Rockland County, New York	286,753	284,279	284,279	0	2,474
St. Lawrence County, New York	111,931	43,996	0	43,996	67,935
Saratoga County, New York	200,635	137,741	125,632	12,109	62,894
Schenectady County, New York	146,555	133,403	133,403	0	13,152
Schoharie County, New York	31,582	5,270	0	5,270	26,312
Schuyler County, New York	19,224	3,882	0	3,882	15,342
Seneca County, New York	33,342	14,198	0	14,198	19,144
Steuben County, New York	98,726	37,242	0	37,242	61,484

	P002001	P002002	P002003	P002004	P002005
	Total population: Total	Total population: Urban	Total population: urbanized areas	Total population: clusters	Total population: Rural
Suffolk County, New York	1,419,369	1,376,543	1,326,532	50,011	42,826
Sullivan County, New York	73,966	21,236	457	20,779	52,730
Tioga County, New York	51,784	18,034	7,892	10,142	33,750
Tompkins County, New York	96,501	56,360	53,528	2,832	40,141
Ulster County, New York	177,749	89,994	68,142	21,852	87,755
Warren County, New York	63,303	38,068	35,279	2,789	25,235
Washington County, New York	61,042	18,091	12,942	5,149	42,951
Wayne County, New York	93,765	34,710	8,990	25,720	59,055
Westchester County, New York	923,459	891,202	891,202	0	32,257
Wyoming County, New York	43,424	15,501	0	15,501	27,923
Yates County, New York	24,621	6,616	0	6,616	18,005

NOTE: A hyphen (-) indicates that data are not available for this geographic area for the selected data element (column) in your custom table. Please consult the [Census 2000 Summary File 1 \(SF 1\) 100-Percent Data Technical Documentation \(PDF 9.1MB\)](#) for more information.

Table 2

	P002001	P002002	P002003	P002004	P002005
	Total population: Total	Total population: Urban	Total population: urbanized areas	Total population: urban clusters	Total population: Rural
Addison town, Steuben County, New York	2,640	0	0	0	2,640
Avoca town, Steuben County, New York	2,314	0	0	0	2,314
Bath town, Steuben County, New York	12,097	7,188	0	7,188	4,909
Bradford town, Steuben County, New York	763	0	0	0	763
Cameron town, Steuben County, New York	1,034	0	0	0	1,034
Campbell town, Steuben County, New York	3,691	319	0	319	3,372
Canisteo town, Steuben County, New York	3,583	0	0	0	3,583
Caton town, Steuben County, New York	2,097	0	0	0	2,097
Cohocton town, Steuben County, New York	2,626	0	0	0	2,626
Corning city, Steuben County, New York	10,842	10,842	0	10,842	0
Corning town, Steuben County, New York	6,426	2,470	0	2,470	3,956
Dansville town, Steuben County, New York	1,977	0	0	0	1,977
Erwin town, Steuben County, New York	7,227	4,942	0	4,942	2,285
Fremont town, Steuben County, New York	964	0	0	0	964
Greenwood town, Steuben County, New York	849	0	0	0	849
Hartsville town, Steuben County, New York	585	0	0	0	585
Hornby town, Steuben County, New York	1,742	0	0	0	1,742
Hornell city, Steuben County, New York	9,019	9,019	0	9,019	0
Hornellsville town, Steuben County, New York	4,042	2,177	0	2,177	1,865

	P002001 Total population: Total	P002002 Total population: Urban	P002003 Total population: urbanized areas	P002004 Total population: urban clusters	P002005 Total population: Rural
County, New York					
Howard town, Steuben County, New York	1,430	0	0	0	1,430
Jasper town, Steuben County, New York	1,270	0	0	0	1,270
Lindley town, Steuben County, New York	1,913	0	0	0	1,913
Prattsburgh town, Steuben County, New York	2,064	0	0	0	2,064
Pulteney town, Steuben County, New York	1,405	0	0	0	1,405
Rathbone town, Steuben County, New York	1,080	0	0	0	1,080
Thurston town, Steuben County, New York	1,309	0	0	0	1,309
Troupsburg town, Steuben County, New York	1,126	0	0	0	1,126
Tuscarora town, Steuben County, New York	1,400	0	0	0	1,400
Urbana town, Steuben County, New York	2,546	285	0	285	2,261
Wayland town, Steuben County, New York	4,314	0	0	0	4,314
Wayne town, Steuben County, New York	1,165	0	0	0	1,165
West Union town, Steuben County, New York	399	0	0	0	399
Wheeler town, Steuben County, New York	1,263	0	0	0	1,263
Woodhull town, Steuben County, New York	1,524	0	0	0	1,524

NOTE: A hyphen (-) indicates that data are not available for this geographic area for the selected data element (column) in your custom table. Please consult the [Census 2000 Summary File 1 \(SF 1\) 100-Percent Data Technical Documentation \(PDF 9.1MB\)](#) for more information.

Bath town, Steuben County, New York

